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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL (Dkt. 314)**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al.
2 (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively, the “Parties” submit this joint
3 stipulation.

4 WHEREAS, on July 20, 2023, Plaintiffs filed an Administrative Motion to File Under Seal
5 materials submitted with Plaintiffs’ motion for class certification (Dkt. 314);

6 WHEREAS, the deadline for Google to file its response was July 27, 2023 as per Civil
7 Local Rule 79-5(f)(3);

8 WHEREAS, on July 24, 2023, the Parties stipulated to an extension of Google’s time to
9 respond to Plaintiffs’ Administrative Motion to File Under Seal by two weeks, to August 10,
10 2023, which the Court entered the same day (Dkt. 317);

11 WHEREAS, on August 2, 2023 the Parties agreed that Google could extend its time to
12 respond to Plaintiffs’ Administrative Motion to File Under Seal by two additional weeks, from
13 August 10, 2023 to August 24, 2023;

14 WHEREAS, the requested extension of this deadline is made to allow for additional time
15 for Google to secure the appropriate declarants and review the extensive material Plaintiffs
16 attached with their motion for class certification;

17 WHEREAS, the requested extension is made without prejudice to Google seeking a further
18 extension of time should the circumstances warrant and to the extent appropriate;

19 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
20 Parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that the deadline for Google
21 to file its response to Plaintiffs’ Administrative Motion to File Under Seal be extended to August
22 24, 2023.

23 A Proposed Order is submitted concurrently herewith.

24 IT IS SO STIPULATED.
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26
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28

1 DATED: August 2, 2023

WILLKIE FARR & GALLAGHER, LLP

2 By: /s/ Benedict Y. Hur

3 Benedict Y. Hur

4 *Attorneys for Defendant Google LLC*

5
6 DATED: August 2, 2023

By: /s/ Ryan McGee

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FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: August 2, 2023

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/s/ Benedict Y. Hur
Benedict Y. Hur

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**[PROPOSED] ORDER GRANTING
REQUEST TO EXTEND TIME TO
RESPOND TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

**[PROPOSED] ORDER GRANTING REQUEST TO EXTEND TIME TO RESPOND TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
Case No. 3:20-CV-04688-RS**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the new deadline for Google to respond to Plaintiffs' Administrative Motion to Seal be extended to August 24, 2023.

IT IS SO ORDERED.

Dated: _____

Honorable Richard Seeborg